

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
HARRISONBURG DIVISION**

IN RE: Cynthia Deavers Forsman

**RESPONSE TO MOTION FOR STAY  
RELIEF**

CARRINGTON MORTGAGE SERVICES, LLC  
*Plaintiff*

Case number: 19-50909

v.

CYNTHIA DEAVERS FORSMAN

and Angela Scolforo, Trustee  
*Defendants*

COMES NOW the Debtors/Defendants, Cynthia Deavers Forsman, by counsel, and responds to the Motion for Stay Relief dated April 28, 2024 as follows:

1. Debtor admits the allegations set forth in paragraph one (1) of the aforesaid motion for stay relief.
2. Debtor admits the allegations set forth in paragraph two (2) of the aforesaid motion for stay relief.
3. Debtor admits the allegations set forth in paragraph three (3) of the aforesaid motion for stay relief.
4. Debtor admits the allegations set forth in paragraph four (4) of the aforesaid motion for stay relief.
5. Debtor admits the allegations set forth in paragraph five (5) of the aforesaid motion for stay relief.
6. Debtor admits the allegations set forth in paragraph six (6) of the aforesaid motion for stay relief.

However, Debtor has made payments since the subject motion for stay relief was filed.

7. Debtor is without sufficient information to admit or deny the allegations set forth in paragraph seven (7) of the aforesaid motion for stay relief and, accordingly, requires strict proof thereof.
8. Debtor denies the allegations set forth in paragraph eight (8) of the aforesaid motion for stay relief.
9. Debtor denies the allegations set forth in paragraph nine (9) of the aforesaid motion for stay relief.

Debtor intends to make arrangements with Plaintiff for the account to become current.

WHEREFORE, Debtor(s) pray that the aforesaid Motion for Stay Relief be denied.

/s/ Roland S. Carlton, Jr.  
Counsel

Roland S. Carlton, Jr., Esq.  
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**CERTIFICATE**

I, Roland S. Carlton, Jr., Esq., do hereby certify that a true and accurate copy of this Response to Motion for Stay Relief was delivered by ECF on May 12, 2023 to:

Bryce Robertson, Esq.  
LOGS Legal Group. LLP  
10021 Balls Ford Road, Suite 200  
Manassas, VA 20109

Angela Scolforo, Esq., Trustee  
P. O. Box 2103  
Charlottesville, VA 22902-2103

/s/ Roland S. Carlton, Jr.  
Roland S. Carlton, Jr., Esq.